

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

*W* JUN 26 2013

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**ANTHONY WIGGINS** and  
**ALEX WIGGINS,**

Defendants.

**MATTHEW J. DYKMAN**

CLERK

CRIMINAL NO. 13-2237

Count 1: 18 U.S.C. § 371:

Conspiracy;

Counts 2-4: 18 U.S.C. § 1361:

Depredation of Government Property.

INDICTMENT

The Grand Jury charges:

Count 1

Between February 25, 2013 and March 28, 2013, both dates being approximate and inclusive, in San Juan County, in the District of New Mexico, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS**, did knowingly and unlawfully combine, conspire confederate and agree with one another to commit the following offense against the United States, to wit, depredation of government property in an amount exceeding \$1,000, contrary to 18 U.S.C. § 1361.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico:

- a. On or about March 6, 2013, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS** knowingly dumped liquid waste pumped from a residential septic tank onto federal land in the vicinity of Farmington, New Mexico;

- b. On or about March 9, 2013, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS**, knowingly dumped liquid waste pumped from a residential septic tank onto federal land in the vicinity of Farmington, New Mexico;
- c. On or about March 28, 2013, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS** knowingly dumped liquid waste pumped from a residential septic tank onto federal land in the vicinity of Farmington, New Mexico.

In violation of 18 U.S.C. § 371.

Count 2

On or about March 6, 2013, in San Juan County in the District of New Mexico, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS**, did willfully commit depredation against property of the United States, to wit, dumping of septic waste on federal land administered by the Bureau of Land Management, such damage exceeding the sum of \$1000.

In violation of 18 U.S.C. § 1361 and 18 U.S.C. § 2.

Count 3

On or about March 9, 2013, in San Juan County in the District of New Mexico, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS**, did willfully commit depredation against property of the United States, to wit, dumping of septic waste on federal land administered by the Bureau of Land Management, such damage exceeding the sum of \$1000.

In violation of 18 U.S.C. § 1361 and 18 U.S.C. § 2.

Count 4

On or about March 28, 2013, in San Juan County in the District of New Mexico, the defendants, **ANTHONY WIGGINS** and **ALEX WIGGINS**, did willfully commit depredation

against property of the United States, to wit, dumping of septic waste on federal land administered by the Bureau of Land Management, such damage exceeding the sum of \$1000.

In violation of 18 U.S.C. § 1361 and 18 U.S.C. § 2.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

C. C. Macabe  
Assistant United States Attorney

/K